

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN HANCOCK LIFE INSURANCE)	
COMPANY, JOHN HANCOCK)	
VARIABLE LIFE INSURANCE)	
COMPANY, and MANULIFE)	
INSURANCE COMPANY (f/k/a)	Civil Action No. 05-11150-DPW
INVESTORS PARTNER LIFE)	
INSURANCE COMPANY),)	
)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
ABBOTT LABORATORIES,)	
)	
<i>Defendant.</i>)	

**ABBOTT LABORATORIES' MOTION
FOR IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Defendant Abbott Laboratories ("Abbott") respectfully moves for leave for to file Exhibits A-R & U of the Affidavit of Ozge Guzelsu ("Exhibits A-R & U"), filed concurrently with the Motion for Protective Order Regarding Deposition Topics 1 and 2 of Hancock's Rule 30(b)(6) Deposition Notice, under seal. This motion is narrowly tailored to address only competitively sensitive information contained in the deposition testimony of Abbott's employees, former employees, and consultants.

Abbott respectfully requests that Exhibits A-R & U be impounded until further Order of the Court. In addition, Abbott respectfully requests that the Court accept Exhibits A-R & U provisionally under Seal pending the Court's ruling on this Motion. Upon termination of the impoundment period, Abbott will retrieve and take custody of Exhibits A-R & U.

The grounds for this motion are that Exhibits A-R & U contain confidential and competitively sensitive information regarding Abbott's development of various drug compounds. For example, the deposition testimony of Keith Hendricks discusses Abbott's internal policies regarding calculating the future sales, probabilities of success, and internal valuations of its compounds. *See* Affidavit, Ex. U. Disclosure of the information contained in these deposition transcripts could cause competitive harm to Abbott by providing competitors with proprietary information regarding Abbott's drug development program, as well as its market analysis and business strategies.

WHEREFORE, Abbott respectfully requests that Exhibits A-R & U be impounded until further Order of the Court. In addition, Abbott respectfully requests that the Court accept Exhibits A-R & U provisionally under Seal pending the Court's ruling on this Motion.

Dated: May 7, 2007

Respectfully submitted,

ABBOTT LABORATORIES

By: /s/ Michael S. D'Orsi

Peter E. Gelhaar (BBO#188310)
Michael S. D'Orsi (BBO #566960)
DONNELLY, CONROY & GELHAAR LLP
1 Beacon St., 33rd Floor
Boston, Massachusetts 02108
(617) 720-2880
peg@dcglaw.com
msd@dcglaw.com

and

Jeffrey I. Weinberger (*pro hac vice*)
Gregory D. Phillips (*pro hac vice*)
Eric J. Lorenzini (*pro hac vice*)
Ozge Guzelsu (*pro hac vice*)
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue
Thirty-Fifth Floor
Los Angeles, CA 90071-1560

Tele: (213) 683-9100

Counsel for Abbott Laboratories

LOCAL RULE 7.1 AND 37.1 CERTIFICATION

The undersigned hereby certifies that counsel for Abbott Laboratories has conferred with counsel for Plaintiffs in a good faith effort to resolve or narrow the issues in this Motion.

_____/s/ Michael S. D'Orsi_____

Date: May 7, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 7, 2007.

Date: May 7, 2007

_____/s/ Michael S. D'Orsi_____